

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

BETH CHANEY MACNEILL,

PLAINTIFF

V.

CIVIL ACTION NO. 4-14CV-242-0

NIRMAL JAYASEELAN, M.D.;
DOMINGO K. TAN, M.D.; CHAD
CARLTON, M.D.; TEXAS HEALTH
HARRIS METHODIST HOSPITAL
FORT WORTH; EMERGENCY MEDICINE
CONSULTANTS LTD; BAYLOR ALL
SAINTS MEDICAL CENTER AT
FORT WORTH AND EMCARE, INC.,

DEFENDANTS.

STIPULATION OF DISMISSAL

TO THE HONORABLE UNITED STATES DISTRICT COURT JUDGE:

Plaintiff and Defendant Chad Carlton, M.D. file this stipulation of dismissal under
FEDERAL RULE OF CIVIL PROCEDURE 41(a)(1)(A)(ii).

1. Plaintiff is Beth Chaney MacNeill. Defendant is Chad Carlton, M.D.
2. On April 8, 2014, Plaintiff sued defendant.
3. Plaintiff moves to dismiss all claims against Chad Carlton, M.D. stemming from the medical care he provided to her in April 2012.
4. Defendant, who has served an answer, agrees to this dismissal.
5. This case is not a class action under FEDERAL RULE OF CIVIL PROCEDURE 23, a derivative action under Rule 23.1, or an action related to an unincorporated association under Rule 23.2.
6. A receiver has not been appointed in this case.

7. This case is not governed by any federal statute that requires a court order for dismissal of the case.
8. Plaintiff has not previously dismissed any federal or state court suit based on or including the same claims as those presented in this case.
9. This dismissal is with prejudice.

Respectfully Submitted,

By:/s/Robert Hammer

ROBERT W. HAMMER

State Bar Card No. 08854780

675 North Henderson, Suite 300

Fort Worth, Texas 76107

(817) 332-8266

(817) 332-8708 (Fax)

ATTORNEYS FOR PLAINTIFF

THIEBAUD REMINGTON THORNTON BAILEY, LLP

By:/s/Russell G. Thornton

RUSSELL G. THORNTON

State Bar Card No. 19982850

rthornton@trtblaw.com

4800 Fountain Place

1445 Ross Avenue

Dallas, Texas 75202

(214) 954-2200

(214) 754-0999 (Fax)

ATTORNEYS FOR DEFENDANT

CHAD CARLTON, M.D.

CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2014, I served each of the following counsel with a copy of the motion electronically through the Court's ECF system:

Mr. Robert Hammer
HAMMER & ASSOCIATES
675 N. Henderson Street, Suite 300
Fort Worth, Texas 76107
Robert@rhammerlaw.com

Mr. Vernon L. Krueger
KRUEGER, BELL & BAILEY, LLP
1701 Market Street, Suite 318, LB 18
Dallas, Texas 75202
Vernon@kbbllp.com

Mr. Michael J. Henry
Attorney at Law, P.C.
675 N. Henderson Street, Suite 300
Fort Worth, Texas 76107
henry@henrytexlaw.com

Julie A. Mederos
MEDEROS PLLC
17950 Preston Rd., Suite 990
Dallas, Texas 75252
firm@mederosattorneys.com

Mr. Jeffrey W. Ryan
CHAMBLEE & RYAN, P.C.
2777 N. Stemmons Frwy., Suite 1157
Dallas, Texas 75207
jwryan@chambleeryan.com

Mr. Randy J. Hall
DECKER, JONES, McMACKIN
MCCLANE, HALL & BATES
Burnett Plaza, Unit 46
801 Cherry Street, Suite 2000
Fort Worth, Texas 76102
rhall@deckerjones.com

Mr. Gregory P. Blaies
Mr. James W. Hrykewicz
BLAIES & HIGHTOWER, LLP
421 W. Third Street, Suite 900
Fort Worth, Texas 76102
gregblaies@bhilaw.com
jwh@bhilaw.com

/s/Russell G. Thornton
RUSSELL G. THORNTON